

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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May 16, 2023

BY ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

**Re: United States v. Sharron Wayne
22 Cr. 631 (PGG)**

Dear Judge Gardephe:

I write, as counsel to Sharron Wayne in the above-captioned matter, to respectfully request that the Court modify Mr. Wayne's pretrial conditions of release to replace the condition of home detention with an electronically enforced curfew to be set by pretrial services. Pretrial services consents to this request; the government defers to pretrial services.

On August 24, 2022, Mr. Wayne was presented in Magistrate Court. After a contested bail hearing, the following conditions were set:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pretrial services supervision as directed; home detention enforced by GPS location monitoring; no possession of any firearms or dangerous instruments; immediate urinalysis followed by drug testing and treatment if positive; surrender all travel documents with travel restricted to the Southern District of New York and the Eastern District of New York.

The Court granted Mr. Wayne's release on his signature on the bond with two weeks to meet the remaining conditions.

For the past nearly nine months, Mr. Wayne has remained in consistent compliance with the conditions of his release. In addition, he has been participating in virtual programing through

Osbourne, and regularly attending GED classes. Given Mr. Wayne's steady compliance with pretrial release and his ongoing rehabilitation efforts, Mr. Wayne now respectfully requests a bail modification to replace the condition of home detention with an electronically enforced curfew to be set by pretrial services. Pretrial services consents to this request; the government defers to pretrial services.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne Lenox

Assistant Federal Defender

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MEMO ENDORSED

The probation is denied. The

defendant has a serious criminal record, including
convictions for robbery, criminal sale and criminal possession of
controlled substances, and criminal possession of a weapon. Pending against
him is a firearms charge. He has repeatedly violated parole.

SO ORDERED:

Paul G. Gardephe

THE HONORABLE PAUL G. GARDEPHE

United States District Judge

cc: Counsel of record

Dated: May 18, 2023